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March 3, 2023

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of January 10, 2023, we are providing a joint status report.

The parties are still in the final stage of implementing a novel and complex Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). Further progress has been made since our last joint status report, but we still need some additional time to complete implementation of the settlement outreach terms. We therefore respectfully request that Your Honor allow us to report back in May 2023.

Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

*On behalf of Defendant,*  
*Samsung Electronics America, Inc.*

Respectfully,

/s/ Jonathan Shub

*On behalf of Plaintiffs*

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)

**ORDERED**

/s/ Michael A. Hammer

**Michael A. Hammer, U.S.M.J.**

Date: